

## REMARKS

Reconsideration of the application is respectfully requested.

Claims 1-42 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication 2004/0239624 A1 issued to Ramian ("Ramian").

Applicant respectfully disagrees with the rejection for the following reasons.

According to the Office Action at page 3, Ramian does not teach "the remainder resembles the desired character" as claimed, but instead makes such a limitation obvious, as explained in paragraphs (c) – (e). According to the Office Action, because Ramian allegedly teaches selecting curves and traces for generating graphic symbols, the remainder of the unselected areas will indicate the desired character by illuminating the selected curves and traces.

Although the Applicant understands the argument made in paragraph (c) on page 3 of the Office Action that in Ramian, a character may be drawn "within a plurality of zones so that it can suggest to a person the respective combination of zones by illuminating the curves within such combination which must be contrasted with the remainder of zones **so that the drawn curves resemble the desired character**", Applicant disagrees that it would have been obvious "to have selected zones ... so that the remainder of the unselected zones resembles the desired character". [Emphasis added] In effect, the Examiner here seems to be stating that since the drawn/illuminated curves on the input surface of Ramian resemble the character, so do the remainder/unilluminated portions of the input surface. This, of course, is not true. No where does Ramian suggest that the user can understand the remainder of the input surface as resembling the character for which the curves were just drawn.

The Office Action on page 3 in paragraph (d) argues that Ramian "teaches selecting curves and traces along a selected plurality of zones for generating graphic symbols with the stylus, so that the remainder of the unselected areas indicate the desired character". This is simply an incorrect statement. Consider, for example, the character "a" shown in Fig. 2 of Ramian. By illuminating the selected curve for the letter "a" in the input surface, **it is this selected group of curves and traces that**

resembles the desired character, and not the remainder of the input surface. Applicant's claim 1 distinguishes between a combination of zones, taken from a plurality of zones, verses the remainder of these zones. Indeed, the Office Action at the top of page 4 states that it is "the drawn curves that resemble the desired character". What is **drawn** in Ramian are the curves and traces that positively define the outline of the character "a", and resemble "a". The remainder is simply not considered in Ramian.

Finally, in paragraph (e) at page 4, the Office Action states that modifying Ramian to arrive at Applicant's claim 1 would have been "required for constructing an alternative way for generating alphanumeric characters", and thereby suggesting the obvious modification. However, this alleged motivation for modifying Ramian is insufficient to make it obvious for one of ordinary skill in the art to modify Ramian. The Office Action does not point to any reason why one of ordinary skill in the art would seek an alternative way for generating the alphanumeric characters of Ramian. Without pointing to such a motivation in the prior art, as opposed to in Applicant's material, the obviousness rejection is improper.

For the above reasons, Applicant respectfully submits that Ramian does not teach or suggest a method for generating a desired character in which mnemonic aids are provided with each aid being designed so that it can suggest to a person a respective combination of one or more zones, from a plurality of zones, and where if the combination is contrasted with the reminder of the plurality of zones, then it is the **remainder** that resembles the desired character.

Nevertheless, claim 1 has been amended to recite another method that is not taught or suggested by Ramian. In Ramian, it is the drawn curves that resemble the character, not what is left behind. In addition, the drawn curves of Ramian do not teach or suggest a selection of zones from a group of zones that abut one another eliminating intervening spaces. Accordingly, claim 1 as amended is also not obvious. Note that support for the amendment may be found in, for example, the Specification as filed, paragraphs [0038] and [0044]. Accordingly, no new matter was added.

Claim 3 has been amended with subject matter supported in paragraph [0044] of the Specification as filed.

Claims 5 and 7 have been amended to remain consistent with the language of claim 1.

Turning now to claim 8, this claim recites a method for generating characters by providing a number of selection zones, and providing a mapping between a selected combination of zones and a desired character, where this mapping is based on representing each character as a juxtaposition of some of a number of open and closed curves, and creating a template containing all of the open and closed curves, and aligning the template with the selection zones.

The Office Action at page 7, second full paragraph, analogizes the creation of this template to material in paragraph [0130] of Ramian. In this paragraph, a database containing associations is described that can be supplied to a user with a default set of data. This means the invention would be able to recognize all symbols known to mankind, if drawn on the input surface 200 in a standard fashion. However, this does not teach or suggest a mapping that is based on representing each character as a juxtaposition of some of a number of open and closed curves, where the selection zones are fewer than the number of curves.

The Office Action at page 7, second full paragraph, has not identified what in Ramian corresponds to Applicant's claimed *plurality of selection zones*. Assuming the position taken in the Office Action where it is stated "Figs. 1-2 wherein the characters 'a' and 'z' being drawn with more curves than the selection zones", this is the exact opposite of what is recited in claim 8. Indeed, in claim 8, Applicant is stating that *each character is represented as a juxtaposition of some of a plurality of curves, the plurality of selection zones being fewer than the plurality of curves*. The rejection of claim 8 is accordingly improper.

Turning now to claim 13, a method for textual communication is recited in which a receiving area bears a combination of marks. These marks represent an alphanumeric character. Each mark has a given form, position and orientation (within the receiving area) that suggests a feature of the character through a complementary, rather than direct relationship with that feature. The Office Action at page 9 repeats the same arguments that were made with respect to claim 1.

Applicant, however, once again disagrees with the rejection of claim 13, because in Ramian, the user activates the invention by applying pressure to a series of preset points, to form a series of interconnected lines, where these lines form a single **trace** which is associated with a character. The invention in Ramian thus captures the trace of each digit. (Ramian, paragraphs [0040] and [0041]) Also see paragraph [0069], “if a trace is made up of interrupted that is disconnected lines, then it is referred to a discontinuous trace. For example, the ‘i’ character would be referred to as a discontinuous trace as it is made of a **vertical line, capped by a single dot ...**” As another example, see paragraph [0074], “for example, a trace, **being a single straight line** can be linked to the character ‘a’. Thereafter, **whenever the user draws a straight line of any length**, the invention outputs a character ‘a’ to the corresponding device.” In view of the foregoing, it is clear that in Ramian, any marks that may be made on the input surface for representing a character can, if at all, suggest a feature of the character only through a direct relationship with that feature, and not a complementary one. Accordingly, Ramian teaches away from the method of claim 13.

Turning now to claim 21, a machine-readable medium is recited as having data that when accessed by a processor maps each of a number of alphanumeric characters to a respective selection of one or more regions from a plurality of regions. This mapping is such that if the respective selection of regions were to be contrasted with the reminder of the plurality of regions, then **the remainder would positively define a plurality of features of the respective character**. Ramian does not teach or suggest such capability.

In Ramian, the character “a”, for example, in Fig. 2 is **drawn** within the input surface, by illuminating the curves as selected by a user’s stylus. Thus, these curves may be said to be contrasted with the reminder of the input surface. However, the remainder does **not** positively define features of the character “a”. Rather, it is the initial drawn curve that positively defines the features of the character. Accordingly, Ramian teaches away from Applicant’s claim 21. To further clarify this point, claim 21 has been amended.

Turning now to claim 29, this claim recites a system having a touch-sensitive display screen and logic that implements an association between each of a number of alphanumeric characters and their respective combination of one or more regions selected from a matrix defined on the display screen. A combination is such that if it were to be visually contrasted with the remainder of the matrix, then the remainder would resemble the associated alphanumeric character. Since the association in Ramian between characters and inputs on the input surface is such that a series of lines form a trace path that resembles the character, such that any “remainder” of the input surface does **not** resemble the character, Ramian teaches away from claim 29.

Turning now to claim 34, this claim recites a computing device having a data entry user interface comprising a character output display area and an input control panel area. An input control matrix is defined within a region of the control panel area that is responsive to an input instrument. This input control matrix is switchable between a number of configurations, where each configuration corresponds to one of a number of character input signals.

The computing device also has an input visualization area defined within the region of the input control panel. This input visualization area and the input control matrix are positioned relative to each other so that one lies over the other, with like parts coinciding.

The input control matrix responds to the input control instrument, to define a input signal that describes a selected configuration of the matrix. A microprocessor interrogates a storage device for a character that corresponds to this input signal. A pictogram of a corresponding, stylized character glyph is then formed on the input visualization area. This pictogram is aligned with the selected configuration of the input control matrix. The apparatus of Ramian has an input surface that does not operate in this manner.

In Ramian, as seen in Fig. 2, each character is shown as the trace drawn by the user. Accordingly, Ramian does not teach or suggest that a microprocessor is to receive an input signal on a control matrix, interrogate a storage device for a corresponding

character, and form a pictogram of a corresponding stylized character glyph on an input visualization area that is aligned with the selected configuration.

Although in Ramian, for example, when the user enters the text "tla", the invention can be trained to automatically capitalize the text to "TLA", the symbol "TLA" is not displayed in an input visualization area that is defined within the region of the input control panel, where this visualization area and the control matrix are positioned relative to each other so that one lies over the other with like parts coinciding. Similarly, in the other example given in Ramian, where a trace being a straight line can be linked to the character "a", Ramian only discloses that whenever the user draws a straight line of any length, the invention "outputs a character 'A' to the corresponding device". Ramian does not teach or suggest that the character "A" be drawn in the manner recited in Applicant's claim 34, in an input visualization area that is defined within a region of an input control panel area where the input visualization area and the input control matrix are positioned relative to each other so that one lies over the other with like parts coinciding. Accordingly, the rejection of claim 34 in view of Ramian is improper.

Turning now to claim 38, a method for inputting characters into a data entry user interface is recited. A glyph formation matrix and an input control matrix are provided in the data entry user interface. These are coextensive with and aligned with each other. A selected configuration of the input control matrix is received. A corresponding alphanumeric character is then identified. An alphanumeric character glyph that corresponds to this selected configuration is then displayed on said glyph formation matrix. Ramian does not teach or suggest such a method.

In Ramian, for example, a trace being a single straight line can be linked to the character "A". Thereafter, whenever the user draws a straight line of any length, the invention outputs a character "A" **to the corresponding device**. In Ramian, the trace is entered using an input surface that has pressure sensitive sensors, which track the movement of an implement. However, Ramian does not disclose how a symbol that is associated with the input trace path is displayed, other than through a **separate** display area than the input surface. See, for example, paragraph [0041], where the mobile

phone illustration is described in which a series of traces representing a telephone number causes the invention to capture the trace of each digit, and the actual interpreted digits (not the trace paths) are emitted to the mobile phone. Note that the trace paths are made in that case in and around the touch pad, as opposed to the mobile phone alphanumeric display panel. Accordingly, this does not teach or suggest the method of Applicant's claim 38.

Claims 41 and 42 are directed to subject matter that is also not obvious in view of Ramian, but have been amended to clarify how contrasting the combination of zones is not taught or suggested by Ramian.

### CONCLUSION

In sum, a good faith attempt has been made to explain why the rejection in view of Ramian is improper. Reconsideration and withdrawal of the art rejection in view of Ramian is respectfully requested.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,  
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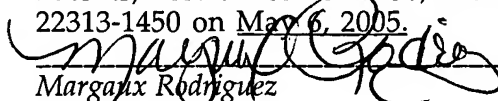
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Margaux Rodriguez  
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